

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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NICOLE BROECKER, et al., on behalf of themselves and all other similarly situated employees of the New York City Department of Education, DOCKET NO.
21-CV-06387

Plaintiffs,

NOTICE OF MOTION

-against-

NEW YORK CITY DEPARTMENT OF EDUCATION,
MEISHA PORTER, in her official and individual
capacities, UNITED FEDERATION OF TEACHERS,
LOCAL 2, AMERICAN FEDERATION OF TEACHERS,
AFL-CIO, MICHAEL MULGREW, in his official and
individual capacities, JOHN DOE #1-10, in their official
and individual capacities; and JANE DOE #1-10 in their
official and individual capacities,

Defendants.

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PLEASE TAKE NOTICE that upon all prior pleadings and proceedings herein, the Declaration of KAROLINA WIADERNA Esq., with annexed exhibits, and the accompanying Memorandum of Law, dated April 4, 2022, the defendants **Martin F. Scheinman, Scheinman Arbitration and Mediation Services, and Scheinman Arbitration and Mediation Services, LLC** will move this Court before the Honorable Kiyo A. Matsumoto, at the United States Courthouse, located at 225 Cadman Plaza East, Brooklyn New York 11201, on a date to be determined by the Court, for an Order: (i) dismissing the complaint, with prejudice, pursuant to Rule 12(b)(6) of the Federal Rules of Civil Procedure for failure to state a claim upon which relief can be granted; and (ii) granting such other and further relief as this Court deems just and proper.

Dated: Garden City, New York
April 4, 2022

Respectfully submitted,
VIGORITO, BARKER, PATTERSON,
NICHOLS & PORTER, LLP

Karolina Wiaderna

KAROLINA WIADERNA, Esq.

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TO:

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CERTIFICATE OF SERVICE

I hereby certify that on April 4, 2022 a copy of the foregoing **NOTICE OF MOTION, DECLARATION, supporting exhibits and MEMORANDUM OF LAW** were served upon the following party via email:

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